



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



## **Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: 57-97-F (R3)

Plant ID: 152

Effective Date: [Click here to enter a date.](#)

Expiration Date: [Click here to enter a date.](#)

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Color Corporation of America  
1630 West Hill Street  
Louisville, KY 40210

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	VOC	HAP
Tons/year:	<25	<5 and 12.5

Permit Writer: Shannon Hosey

Public Notice Date: 6/3/2014

{manager1}  
Air Pollution Control Officer  
{date1}

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**FEDOOP Permit Revisions/Changes**

<b>Revision No.</b>	<b>Issue Date</b>	<b>Public Notice Date</b>	<b>Type</b>	<b>Attachment No./ Page No.</b>	<b>Description</b>
N/A	04/22/1997	03/16/1997	Initial	Entire Permit	Initial Permit Issuance
R1	04/04/2000	03/05/2000	Minor	General Conditions Pages 2-4	Incorporate revisions to General Conditions #4, #11, #12, and #13; New General Conditions #13 and #14
R2	04/16/2002	02/17/2002	Significant	Entire Permit	Permit Renewal; Incorporate Construction Permit 37-00-C
R3	xx/xx/20xx	06/03/2014	Renewal	Entire Permit	Permit Renewal; Incorporate Construction Permits 357-06-C, 240-06-C, 695-08-C and 37364-13-C

### Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
HCl	- Hydrogen chloride
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District [Form 9440-0](#).
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or an anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, sulfur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides, lead, gaseous fluorides, or Volatile Organic Compounds (VOC) as listed in District Regulation 3.04; any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gases whose combined global warming potential equals or exceeds 100,000 tons CO<sub>2</sub>-equivalent, as defined in 40 CFR 98 (except that prior to July 21, 2014, the mass of the greenhouse gas carbon dioxide shall not include biogenic carbon dioxide emissions defined in 40 CFR 52.21(b)(49)(ii)(a)).

Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the statement "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete" and the signature and title of a responsible official of the company. The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.
13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emissions Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.07	Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
2.17	Federally Enforceable District Origin Operating Permits
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors in the Ambient Air
2.08	Fees
5.00	Definitions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.01	General Provisions (Standards for Toxic Air Contaminants and Hazardous Air Pollutants)
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
Room 205  
850 Barret Ave  
Louisville, KY 40204-1745***

## Emission Unit U1

### U1 Unit Description:

One (1) paint packing operation, consisting of one (1) quart and gallon filling line (E16) and one (1) five gallon can filling line (E17).

One (1) paint thinning operation, consisting of one (1) 2600 gallon letdown tank with 150 HP mixer (E50), one (1) 2000 gallon letdown tank with one (1) 100 HP mixer (E11), one (1) 1200 gallon letdown tank with one (1) with 60 HP mixer (E12), one (1) 1000 gallon letdown tank with one (1) 60 HP mixer (E13), one (1) 50 HP portable mixer (E14) and one (1) tote wash equipment (E15).

One (1) paint milling operation, consisting of one (1) 150 liter mill (E6), one (1) 150 liter mill (E7), two (2) 50-65 liter mills (E8A and E51), one (1) 50 liter mill (E8B), two (2) 10 liter mills (E9A and E9B), and one (1) 60 liter mill (E10)

One (1) paint mixing operation, consisting of three (3) 1000 gallon premix tanks with two 125 HP mixers (E1 and E2) and one 100 HP mixer (E3), two (2) 300 gallon portable disp ensers each with a 50 HP mixer (E4 and E5), one (1) 1800 gallon premix tank with 200 HP mixer (E52).

### U1 Applicable Regulations:

Federally Enforceable Regulations		
Regulation	Title	Applicable Sections
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	63.11599, 63.11600, 63.11601, 63.11602, 63.11603, 63.11605, 63.11606 and 63.11607



**U1 Equipment:**

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E1	1000 Gallon Premix Tank with 125 HP Mixer	6.09, 6.24 and 40 CFR 63 Subpart CCCCCCC	C1
E2	1000 Gallon Premix Tank with 125 HP Mixer		
E3	1000 Gallon Premix Tank with 100 HP Mixer		
E4	300 Gallon Portable Dispenser with 50 HP Mixer		
E5	300 Gallon Portable Dispenser with 50 HP Mixer		
E6	150 Liter Mill	6.09, 7.25 and 40 CFR 63 Subpart CCCCCCC	
E7	150 Liter Mill		
E8A	50-65 Liter Mill		
E8B	50 Liter Mill		
E9A	10 Liter Mill		
E9B	10 Liter Mill		
E10	60 Liter Mill		
E11	2000 Gallon Letdown Tank with 100 HP Mixer	6.24 and 40 CFR 63 Subpart CCCCCCC	NA
E12	1200 Gallon Letdown Tank with 60 HP Mixer		
E13	1000 Gallon Letdown Tank with 60 HP Mixer		
E14	50 HP Portable Mixer		
E15	Tote Wash Equipment		
E16	Quart and Gallon Filling Line		
E17	Five Gallon Can Filling Line		
E50	2600 Gallon Letdown Tank with 150 HP Mixer	7.25 and 40 CFR 63 Subpart CCCCCCC	C1
E51	50-64 Liter Mill		
E52	1800 Gallon Premix Tank with 200 HP Mixer		
E53	50 HP Basket Mill		
E54	25 HP Mixer		
E55	10 HP Mixer for Drums		

**U1 Control Devices:**

<b>Control Device ID</b>	<b>Description Make/Model</b>	<b>Stack ID</b>
C1	Industry Clean Air, Inc. Bag Filter	S1

**U1 Specific Conditions****S1. Standards** (Regulation 2.17, section 5.2)**a. VOC**

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1) (See U1 Comment 1)
- ii. For Emission Points E1, E2, E3, E4, E5, E11, E12, E13, E14, E15, E16, and E17:
  - 1) The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
  - 2) The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)
- iii. For Emission Points E6, E7, E8A, E8B, E9A, E9B, E10, E50, E51, E52, E53, E54 and E55, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1) (See U1 Comment 3)

**b. Opacity**

For Emission Points E1, E2, E3, E4, E5, E6, E7, E8A, E8B, E9A, E9B, and E10, the owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 6.09, section 3.1)

c. **PM**

For Emission Points E1, E2, E3, E4, E5, E6, E7, E8A, E8B, E9A, E9B, and E10, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr per piece of equipment. (Regulation 6.09, section 3.2) (See U1 Comment 2)

d. **HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.2) (See U1 Comment 1)
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.3) (See U1 Comment 1)
- iii. The owner or operator must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. (40 CFR 63.11601(a)(1))
- iv. The owner or operator must capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form. (40 CFR 63.11601(a)(2))
- v. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or (40 CFR 63.11601(a)(3)(i))
  - 2) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form. (40 CFR 63.11601(a)(3)(ii))
- vi. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(5) during the grinding and milling of materials containing compounds of

- cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(i))
- 2) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(ii))
  - 3) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel. (40 CFR 63.11601(a)(4)(iii))
- vii. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere. (40 CFR 63.11601(a)(5))
- viii. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of §63.11601(b)(1)(i) through §63.11601(b)(1)(iii). (40 CFR 63.11601(b)(1))
- (1) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process. (40 CFR 63.11601(b)(1)(i))
  - (2) The covers or lids must maintain contact along at least 90- percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent. (40 CFR 63.11601(b)(1)(ii))
  - (3) The covers or lids must be maintained in good condition. (40 CFR 63.11601(b)(1)(iii))
- ix. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft. (40 CFR 63.11601(b)(2))
- x. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if: (40 CFR 63.11601(b)(3))

- (1) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and (40 CFR 63.11601(b)(3)(i))
  - (2) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel. (40 CFR 63.11601(b)(3)(ii))
- xi. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection. (40 CFR 63.11601(b)(4))
  - xii. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (40 CFR 63.11601(b)(5))

**S2. Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

Records shall be readily retrievable and shall be maintained for five (5) years prior to disposal.

**a. VOC**

- i. For Emission Points E1, E2, E3, E4, E5, E11, E12, E13, E14, E15, E16, and E17, the owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:
  - 1) The hours of operation of the equipment or usage for each day;
  - 2) The daily amount used in gallons of each solvent, cleaner, etc; and
  - 3) Monthly calculations showing the average hourly and daily VOC emissions.
- ii. For Emission Points E6, E7, E8A, E8B, E9A, E9B, E10, E50, E51, E52, E53, E54 and E55 subject to Regulation 7.25:
  - 1) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during each 12 consecutive month period.

- 2) The owner or operator shall calculate the VOC emissions during each 12 consecutive month period to demonstrate compliance with Specific Condition S1.a.iii.
- iii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

**b. Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation and daylight hours, of the Emission Points E1, E2, E3, E4, E5, E6, E7, E8A, E8B, E9A, E9B, and E10. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**c. PM**

For Emission Points E1, E2, E3, E4, E5, E6, E7, E8A, E8B, E9A, E9B, and E10, the owner or operator shall, monthly, perform visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

**d. HAP**

- i. The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

- ii. The owner or operator must maintain the records specified in §63.11603(c)(1) through §63.11603(c)(4) in accordance with §63.11603(c)(5) through §63.11603(c)(6), for five years after the date of each recorded action. (40 CFR 63.11603(c))
  - 1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with §63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted. (40 CFR 63.11603(c)(1)) (See U1 Comment 4)
  - 2) You must keep a copy of each Annual Compliance Certification Report prepared in accordance with §63.11603(b). (40 CFR 63.11603(c)(2))
  - 3) You must keep records of all inspections and tests as required by §63.11602(b). (40 CFR 63.11603(c)(3))
  - 4) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). (40 CFR 63.11603(c)(4))
  - 5) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. (40 CFR 63.11603(c)(5))
  - 6) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years. (40 CFR 63.11603(c)(6))

**S3. Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall include the following information in the annual compliance report.

**a. VOC**

The owner or operator shall report the following information:

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

**b. HAP**

- i. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.
- ii. You must prepare an annual compliance certification report according to the requirements in §63.11603(b)(1) through §63.11603(b)(3). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. (40 CFR 63.11603(b))
  - (1) You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in §63.11603(b)(1)(i) through §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(1))
    - (a) Each annual compliance certification report must cover the annual reporting period from January 1 through December 31. (40 CFR 63.11603(b)(1)(ii))
    - (b) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15. (40 CFR 63.11603(b)(1)(iii))
  - (2) The annual compliance certification report must contain the information specified in §63.11603(b)(2)(i) through §63.11603(b)(2)(iii). (40 CFR 63.11603(b)(2))
    - (a) Company name and address; (40 CFR 63.11603(b)(2)(i))
    - (b) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and (40 CFR 63.11603(b)(2)(ii))
    - (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month



period beginning on January 1 and ending on December 31.  
(40 CFR 63.11603 (b)(2)(iii))

- (3) If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(3))

c. **Opacity**

- i. Identification of all periods of exceedances;
- ii. The number of surveys where visible emissions were observed;
- iii. The date, time, and results of each Method 9 that exceeded the opacity standard; and
- iv. Description of any corrective action taken for each exceedance.

d. **PM**

There are no routine compliance reporting requirements for this equipment.

e. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.e.ii.

**U1 Comments**

1. On 5/21/14, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.
2. The District has performed a one-time PM compliance demonstration for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.
3. As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#386-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required with this construction application and the plant-wide limit remains at 10 tons/year.
4. Color Corporation submitted an initial notification on June 2, 2010.

**Emission Unit U5****U5 Unit Description:**

Tank farm consisting of four (4) storage tanks 8,000 gallons each all of which are bottom fill and equipped with conservation vents (E18 – E21).

Two (2) storage vessels (2,495 gallons each) designated as Tank 206 (E22) and Tank 207 (E23) for storing raw materials SU022M (35% n-butyl acetate) and SU0109M (35% propylene glycol monomethyl ether acetate)(Construction Permit – 357-06-C).

One (1) solvent recovery system consisting of a 300 gallon “dirty” solvent storage tank (E25), a solvent distillation unit (E24), and a 200 gallon reclaimed (clean) solvent storage tank (E26) (Construction Permit – 695-08-C).

One (1) automatic washing system including one (1) 320 gallon solvent recycle tank (Construction Permit – 240-06-C).

Three (3) Basket Mills, BM2, BM3, and BM4, 2000 lb/hr each (Construction Permit – 75-10-C)

Two (2) process letdown tanks, 2,400 gallon capacity (2,100 gallon working capacity)(E43 and E44)(Construction Permit – 35050-12-C).

Three (3) Storage Tanks designated as Tank 204 (E56), Tank 205 (E57) and Tank 209 (16,900 gallons) (E58).

**U5 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
6.13	Standard of Performance for Existing Storage Vessels for Volatile Organic Compounds	1 through 5
7.12	Standards of Performance for New Storage Vessels for Volatile Organic Compounds	1, 2, 3, 4, 5, 7 & 8
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing	63.11599, 63.11600, 63.11601, 63.11602, 63.11603, 63.11605, 63.11606 and 63.11607

**U5 Equipment:**

Emission Point ID	Description Make/Model	Applicable Regulation	Control Device (Control ID)
E18	8000 Gallon Bottom Fill Storage Tank	6.13 and 40 CFR 63 Subpart CCCCCC	N/A
E19	8000 Gallon Bottom Fill Storage Tank		
E20	8000 Gallon Bottom Fill Storage Tank		
E21	8000 Gallon Bottom Fill Storage Tank		
E22	SU022M (35% n-butyl acetate) Storage Tank 206 2,495 Gallons	7.12 and 40 CFR 63 Subpart CCCCCC	
E23	SU0109M (35% propylene glycol monomethyl ether acetate) Storage Tank 207 2,495 Gallons		
E24	Solvent Distillation Unit	7.25 and 40 CFR 63 Subpart CCCCCC	
E25	300 Gallon “Dirty” Solvent Storage Tank	7.12 and 40 CFR 63 Subpart CCCCCC	
E26	200 Gallon Reclaimed (Clean) Solvent Storage Tank		
E27	Hockmeyer Model CMX-100 Automatic Washing System	7.25 and 40 CFR 63 Subpart CCCCCC	
E28	320 Gallon Solvent Recycle Tank		
E29	Basket Mill BM2, Hockmeyer Model HCP-20, 2000 lb/hr		
E30	Basket Mill BM3, Hockmeyer Model HCP-20, 2000 lb/hr		
E31	Basket Mill BM4, Hockmeyer Model HCP-20, 2000 lb/hr		
E43	Process Letdown Tank, Custom Metal Craft, 2,400 Gallons		
E44	Process Letdown Tank, Custom Metal Craft, 2,400 Gallons		
E56	Storage Tank 204		
E57	Storage Tank 205		

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E58	Storage Tank 209, 16,900 Gallons		

**U5 Control Devices:**

There are no control devices associated with Emission Unit U5.

**U5 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. VOC**

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1) (See U5 Comment 1)
- ii. For Emission Points E18, E19, E20, E21, E22, E23, E25 and E26, the owner or operator shall not store VOC materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. (Regulation 6.13 and 7.12, section 3.3)
- iii. For Emission Points E24, E27, E28, E29, E30, E31, E43, E44, E56, E57 and E58, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1) (See U5 Comment 3)

**b. HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.2) (See U5 Comment 1)
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.3) (See U5 Comment 1)
- iii. The owner or operator must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. (40 CFR 63.11601(a)(1))
- iv. The owner or operator must capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form. (40 CFR 63.11601(a)(2))

- v. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(6) during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or (40 CFR 63.11601(a)(3)(i))
  - 2) Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form. (40 CFR 63.11601(a)(3)(ii))
- vi. The owner or operator must:
  - 1) Capture particulate emissions and route them to a particulate control device meeting the requirements of §63.11601(a)(5) during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(i))
  - 2) Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or (40 CFR 63.11601(a)(4)(ii))
  - 3) Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel. (40 CFR 63.11601(a)(4)(iii))
- vii. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to the atmosphere. (40 CFR 63.11601(a)(5))
- viii. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the requirements of §63.11601(b)(1)(i) through §63.11601(b)(1)(iii). (40 CFR 63.11601(b)(1))
  - (1) The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process. (40 CFR 63.11601(b)(1)(i))
  - (2) The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the

circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent. (40 CFR 63.11601(b)(1)(ii))

- (3) The covers or lids must be maintained in good condition. (40 CFR 63.11601(b)(1)(iii))
- ix. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft. (40 CFR 63.11601(b)(2))
- x. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if: (40 CFR 63.11601(b)(3))
  - (1) All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and (40 CFR 63.11601(b)(3)(i))
  - (2) No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel. (40 CFR 63.11601(b)(3)(ii))
- xi. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection. (40 CFR 63.11601(b)(4))
- xii. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. (40 CFR 63.11601(b)(5))

## **S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

### **a. VOC**

- i. For Emission Points E18, E19, E20, E21, E22, E23, E25 and E26 subject to Regulation 6.13 and 7.12:



- 1) The owner or operator shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the new vapor pressure, and the date of the change in order to demonstrate compliance with Specific Condition S1.a.ii.
  - 2) The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.
- ii. For Emission Points E24, E27, E28, E29, E30, E31, E43, E44, E56, E57 and E58, subject to Regulation 7.25:
- 1) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during each 12 consecutive month period.
  - 2) The owner or operator shall calculate the VOC emissions during each 12 consecutive month period to demonstrate compliance with Specific Condition S1.a.iii.
- iii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.
- b. **HAP**
- i. The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.
  - ii. The owner or operator must maintain the records specified in §63.11603(c)(1) through §63.11603(c)(4) in accordance with paragraph §63.11603(c)(5) through §63.11603(c)(6), for five years after the date of each recorded action. (40 CFR 63.11603(c))
    - 1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification that you submitted in accordance with §63.11603(a), and all documentation supporting any Notification of Applicability and Notification of Compliance Status that you submitted. (40 CFR 63.11603(c)(1)) (See U5 Comment 4)

- 2) You must keep a copy of each Annual Compliance Certification Report prepared in accordance with §63.11603(b). (40 CFR 63.11603(c)(2))
- 3) You must keep records of all inspections and tests as required by §63.11602(b). (40 CFR 63.11603(c)(3))
- 4) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). (40 CFR 63.11603(c)(4))
- 5) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each recorded action. (40 CFR 63.11603(c)(5))
- 6) You must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). You may keep the records offsite for the remaining 3 years. (40 CFR 63.11603(c)(6))

**S3. Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall include the following information in the annual compliance report.

**a. VOC**

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

**b. HAP**

- i. The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.
- ii. You must prepare an annual compliance certification report according to the requirements in §63.11603(b)(1) through §63.11603(b)(3). This report does not need to be submitted unless a deviation from the requirements of this subpart has occurred. When a deviation from the requirements of this subpart has occurred, the annual compliance certification report must be submitted along with the deviation report. (40 CFR 63.11603(b))

- (1) You must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in §63.11603(b)(1)(i) through §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(1))
  - (a) Each annual compliance certification report must cover the annual reporting period from January 1 through December 31. (40 CFR 63.11603(b)(1)(ii))
  - (b) Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15. (40 CFR 63.11603(b)(1)(iii))
- (2) The annual compliance certification report must contain the information specified in §63.11603(b)(2)(i) through §63.11603(b)(2)(iii). (40 CFR 63.11603(b)(2))
  - (a) Company name and address; (40 CFR 63.11603(b)(2)(i))
  - (b) A statement in accordance with §63.9(h) of the General Provisions that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart; and (40 CFR 63.11603(b)(2)(ii))
  - (c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31. (40 CFR 63.11603 (b)(2)(iii))
- (3) If a deviation has occurred during the reporting period, you must include a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken. This deviation report must be submitted along with your annual compliance certification report, as required by §63.11603(b)(1)(iii). (40 CFR 63.11603(b)(3))

**U5 Comments**

1. On 5/21/2014, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.
2. For storage vessel E25 and E26, Regulation 7.12 applies due to the size of the tank, but since the vapor pressure as stored is less than 1.5 psia submerged fill is not required.
3. As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#386-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required with this construction application and the plant-wide limit remains at 10 tons/year.
4. Color Corporation submitted an initial notification on June 2, 2010.

**Emission Unit U8****U8 Unit Description:**

Two (2) site-constructed spray booths with dry filters.

One (1) table top QC Spray Booth.

**U8 Applicable Regulations:**

<b>Federally Enforceable Regulations</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
6.09	Standards of Performance for Existing Process Operations	1 through 3
6.24	Standard of Performance for Existing Sources Using Organic Materials	1 through 5
7.08	Standards of Performance for New Process Operations	1 through 4
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 5

**U8 Equipment:**

<b>Emission Point ID</b>	<b>Description Make/Model</b>	<b>Applicable Regulation</b>	<b>Control Device (Control ID)</b>
E45	Spray Booth with Filters	6.09 and 6.24	N/A
E46	Spray Booth with Filters		
E47	QC Spray Booth	7.08 and 7.25	

**U8 Control Devices:**

There are no control devices associated with Emission Unit U8 besides the associated paint filters.

**U8 Specific Conditions****S1. Standards (Regulation 2.17, section 5.2)****a. VOC**

- i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period. (Regulation 2.17, section 5.1) (Regulation 5.00, section 1.13.5.1) (See U8 Comment 1)
- ii. For Emission Points E45 and E46:
  - 1) The owner or operator shall not discharge into the atmosphere more than forty (40) pounds of VOC in any one day, nor more than eight (8) pounds in any one hour, from any existing affected facility in which any Class II solvent is used unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.2)
  - 2) The owner or operator shall not discharge into the atmosphere more than three thousand (3,000) pounds of VOC in any one day, nor more than four hundred fifty (450) pounds in any one hour, from any existing affected facility in which any Class III solvent or any material containing such solvent is employed or applied unless the emissions have been reduced by at least eighty-five percent (85%) by weight. (Regulation 6.24, section 3.3)
- iii. For Emission Point E47, the owner or operator shall not allow or cause plant-wide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to equal or exceed 10 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1) (See U8 Comment 3)

**b. PM**

- i. For Emission Points E45 and E46, the owner or operator shall not allow PM emissions to exceed 2.58 lb/hr per piece of equipment. (Regulation 6.09, section 3.1.2) (See U8 Comment 2)
- ii. For Emission Point E47, the owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment. (Regulation 7.08, section 3.1.2) (See U8 Comment 2)

c. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% (Regulation 6.09, section 3.1 and Regulation 7.08, section 3.1.1)

d. **HAP**

- i. The owner or operator shall not allow or cause the plant-wide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.2) (See U8 Comment 1)
- ii. The owner or operator shall not allow or cause the plant-wide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period. (Regulation 5.00, section 1.13.5.3) (See U8 Comment 1)

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. For Emission Points E45 and E46, the owner or operator shall maintain the following records to demonstrate ongoing compliance with Regulation 6.24, Section 3:
  - 1) The hours of operation of the equipment or usage for each day;
  - 2) The daily amount used in gallons of each solvent, cleaner, etc; and
  - 3) Monthly calculations showing the average hourly and daily VOC emissions.
- ii. For Emission Point E47 subject to Regulation 7.25:
  - 1) The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during each 12 consecutive month period.
  - 2) The owner or operator shall calculate the VOC emissions during each 12 consecutive month period to demonstrate compliance with Specific Condition S1.a.iii.
- iii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month plant-wide VOC emissions.

b. **PM**

See Specific Conditions S2.c.

c. **Opacity**

- i. The owner or operator shall inspect the filters in the spray booth monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

d. **HAP**

The owner or operator shall calculate and record the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

S3. **Reporting (Regulation 2.17, section 5.2)**

The owner or operator shall include the following information in the annual compliance report.

a. **VOC**

- i. The total plant-wide 12 consecutive month VOC emissions for each month in the reporting period;
- ii. Identification of all periods of exceedance of the VOC emissions limits; and
- iii. A description of corrective actions taken for each exceedance.

b. **PM**

There are no routine compliance reporting requirements for this equipment.

c. **Opacity**

There are no routine compliance reporting requirements for this equipment.

d. **HAP**

The owner or operator shall report the plant-wide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.



**U8 Comments**

1. On 5/21/2014, source requested the limits of the criteria pollutant VOC < 25 tpy, Total HAPs < 12.5 tpy and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5.
2. A one-time PM compliance demonstration has been performed and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.
3. As stated in Regulation 7.25, section 3.2, affected facilities permitted prior to December 16, 1987, that emit no more emissions than that permitted at such date shall be deemed to be in compliance. The source was permitted for less than 5 tons/year for each attachment (#386-85 and #192-94), that were combined into a plant-wide allowable emission limit of less than 10 tons/year in the operating permit. The source is not required to submit a BACT analysis unless they request a change in the plant-wide Regulation 7.25 VOC limit of 10 tons/year. The source did not request a change to the plant-wide Regulation 7.25 VOC limit; therefore, no BACT analysis was required with this construction application and the plant-wide limit remains at 10 tons/year.
4. Emission Points E45, E46 and E47 are not currently subject to the standards of the NESHAP, 40 CFR 63 subpart HHHHHH, due to this coating operation being a quality control activity, as defined in § 63.11180.

**Insignificant Activities**

<b>Description</b>	<b>Quantity</b>	<b>Basis</b>
Natural Gas 4.2 MMBTU/hr Boiler	1	Regulation 1.02, Appendix A, section 1.1

- 1) Insignificant activities identified in District Regulation 1.02 Appendix A may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02 Appendix A shall comply with generally applicable requirements.
- 3) Activities identified in regulation 1.02, Appendix A, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the permit.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) In lieu of recording annual throughputs and calculating actual annual emissions, the owner or operator may elect to report the pollutant Potential To Emit (PTE), as the annual emission for each piece of equipment, since the emissions from the source's Insignificant Activities are very minor in comparison to the plant wide emissions.
- 6) The owner or operator shall annually submit an updated list of insignificant activities, including an identification of the additions and removals of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.